

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Rockford Paperboard - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #3
Progress 3
Rockford Paperboard
C550
Rockford, MI
Latitude: 43.1030374 Longitude: -85.5781170

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From: Jeffrey Kimble / Elizabeth Nightingale, OSCs
Date: 2/13/2012
Reporting Period: 2/3/2012 through 2/24/2012

1. Introduction

1.1 Background

Site Number:	C550	Contract Number:	EP-S5-08-02
D.O. Number:	0101	Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	1/23/2012	Start Date:	1/23/2012
Demob Date:		Completion Date:	
CERCLIS ID:	MIN000510634	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

EPA has initiated a time critical removal action at the site to remove numerous containers of characteristically hazardous flammable, corrosive and other wastes. Container sizes range from 5-gallons pails to 1,000-gallon tanks

1.1.2 Site Description

The site is comprised of a vacant paper mill building with ancillary equipment, parking areas, lawn areas and wooded areas adjacent to the Rogue River. The site occupies an approximate area of 17.58 acres in an industrial setting and is bordered by Childsdales Avenue to the northwest, a wooded area to the northeast, and the Rogue River to the southeast and southwest. The site operated as paperboard/carton box production facility from 1940 until 2001. The site is now abandoned.

1.1.2.1 Location

The Rockford Paperboard Site (Site) is located at 7700 (aka 7734) Childsdales Avenue in the City of Rockford, Kent County, Michigan, 49341. Coordinates for the site are 43.102421 degrees latitude and -85.577036 degrees longitude.

1.1.2.2 Description of Threat

The presence of hazardous substances at the site has been documented through EPA field screening and laboratory analysis. The site evaluation documented 30 small containers, 1 cylinder, 1 tote of solvent, 3 pallets of CR-800 Titanium Dioxide (Manufactured by Kerr McGee), 1 pallet Polyvinyl Alcohol, 1 tote containing a mix of Cyclohexylamine [108-91-8] and NN Diethylsnoismine [100-37-8], 73 drums of unknown materials, 2 1,000-gallon tanks of unknown wastes, 10 300-gallon totes of unknown wastes, 7 bags of Polyethylene glycol 3350 granules, and 4 large totes of liquid waste. There is also a chemical laboratory. Further inspection revealed additional containers of waste, including a large tank containing caustic material, and a polymer spill to the ground inside and outside the facility.

The site building is in various states of disrepair. Holes in the roof and walls of the building allow

precipitation to enter. This precipitation will lead to the further degradation of site containers and contribute to the likelihood of release. Similarly, gas service has been cut-off to the building and no heat is available. Freezing of the chemicals on site can lead to expansion and bulging of the containers and increase the likelihood of release. Lastly, the building currently sits vacant and perimeter fencing is incomplete, which can lead to trespassers. Trespassers have the potential to cause an accidental or purposeful release to the environment. The Rogue River lies less than 100 feet from the rear of the building.

The conditions remaining at the site present substantial threat to the public health, or welfare, and the environment and meet the criteria for a time-critical removal action as provided for in the NCP, 40 C.F.R. §300.415(b)(2).

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA assessment results showed that the wastes in drums, vats, totes, tanks, compressed gas cylinders, and other miscellaneous containers is hazardous. Several drum samples had a pH greater than 12.5 SUs, one drum sample was so acidic an accurate measurement was not able to be obtained, and lab-grade acids were also found to be present. Numerous drums showed labeling or indicated via field instrumentation that they hold volatile organic compounds. Two drum samples met the criteria to be considered ignitable waste (D001).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

EPA clean up operations continue. See Sitrep 1 for more information.

2.1.2 Response Actions to Date

EPA and its contractors (START and ERRS) continued the time critical removal actions.

On Monday February 6, 2012, the crew completed hazcatting of the drums, identified 6 waste streams, organized all drums by waste stream, utilized samples from each drum to test compatibility of waste within each waste stream, and collected additional material from the drums to create composite samples of each waste stream for lab analysis. Tank 2, the poly tank in the boiler room, was fully dismantled today and disposed of as non-hazardous waste, after contents were determined to be non-hazardous. The crew also continued work to remove some of the spilled polymer material from the interior floor. The crew conducted air monitoring in the work zones for O₂, LEL, H₂S, CO and VOC. Air monitoring will be conducted daily and a record will be kept in the site file of the readings. Additional work was done to grade the parking lot.

On Tuesday February 7, 2012, Tank 3, the large storage tank from the chemical storage room, was cleaned out and fully dismantled. Two drums were found to have slow leaks (one non-haz, one combustible liquid). The crew attempted to pump the contents into alternative containers, but was unable to do so due to the viscosity of the contents. The drums were bermed with floor dry. Another load of stone was received and the crew spread it and graded the parking area. Waste disposal profile samples were submitted to the laboratory for analysis.

On Wednesday February 8, 2012, the crew enclosed the two leaking drums in drum liners. The crew began work to access Tank 1 (caustic tank) by removing a surrounding guardrail and cutting a larger access hole in the tank, so contents could be removed (after disposal containers are received). Air monitoring indicated elevated carbon monoxide during this work, so engineering controls were implemented. Small containers were organized by type in the warehouse. The crew attempted to remove more of the spilled polymer from the floor.

On Thursday February 9, 2012, the crew cleaned and scraped contaminated floors. The materials that were removed from the floors were placed into one of the rolloff boxes for off site disposal.

On Friday, February 10, 2012, the crew continued cleaning facility floors. The small containers were bulked into the larger waste streams, and empty containers were placed into a roll off box for eventual disposal.

On Saturday, February 11, 2012, the crew continued cleaning facility floors.

On Sunday, February 12, 2012, off hours security was on site. No other work occurred.

On Monday, February 13, 2012, totes were delivered to the site for waste bulking to prepare for disposal. The crew bulked the acids in totes and also pumped flammables and combustible liquids out of a damaged tote and into a DOT-shippable tote.

On Tuesday, February 14, 2012, ERRS cut up and crushed approximately 20 RCRA empty poly and metal drums. The drums were placed in the RCRA empty roll-off box for disposal. Dixon Environmental was on site to conduct Phase II ESA. Liquid was pumped out of Tank-1 and into clean empty caustic tote. START conducted air monitoring throughout all bulking activities.

On Wednesday, February 15, 2012, 1-gallon paint buckets and various other 5-gallon bucket, small containers, and aerosol cans were overpacked into a 1-yard box disposal box. ERRS continued bulking the flammables/combustible waste streams. The crew also bulked the neutral liquids drums into two totes. The crew continued removing product from the large caustic tank.

On Thursday, February 16, 2012, the crew cut up RCRA empty poly drums for disposal. Breathing zone air monitoring was conducted. RCRA empty metal drums were moved to the loading dock for crushing. A new roll-off box was delivered to the Site for crushed/cut RCRA empty containers.

On Friday, February 17, 2012, the crew cleaned and demobilized the skid steer and other equipment and demobilized from site. The site work will be on hiatus until the week of February 27th, 2012. The OSC anticipates that will be the final week of work. 24-hour site security will be in place until EPA and its contractors remobilize.

From 2/18/2012 through 2/26/2012, no site work occurred or will occur on site as the

disposal approvals are established. 24-hour site security will remain in place until EPA and its contractors remobilize on 2/27/2012.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Rockford Paperboard (former Converters Paperboard)

EPA is conducting a fund lead cleanup because they do not believe that Rockford Paperboard has assets available to conduct the cleanup on a time critical schedule.

The Bridgeway Community Church has expressed interest in receiving the property after EPA completes the cleanup. The Church is planning a phase 2 assessment of the property, and has plans to demolish approximately 80% of the facility structure. The remaining building will be re-habbed into their new church home. Bridgeway Community Church has no previous liability at the site and is not a PRP. The Church also submitted a grant application to MDEQ, but the grant was stopped in it's final stage and the church will not receive MDEQ grant assistance for demolition activities. If the Church completes this second phase of the project, additional environmental benefits will be achieved.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

EPA will continue site work until waste disposal is complete

2.2.1.1 Planned Response Activities

- Decontaminate facility floors as required
- Recontainerize/repackage waste for off site disposal
- Demobilize from site

2.2.1.2 Next Steps

Complete removal actions and dispose of waste.

2.2.2 Issues

None. Site work is proceeding according to the SOW in the Action Memo

2.3 Logistics Section

The crew is operating out of 2 on site trailers (10 by 30). Temporary electric is being provided

through a generator. Security is on site for all non work hours and will remain for the duration of the project.

The following equipment has been mobilized to the site:

Skid steer with attachmnets
 40 K generator
 Port-o-lets (2)
 Trash dumpster (10 cubic yards)
 Storage trailer
 Light plant
 Forklift (5000 pounds)
 Rolloff boxes (2, 30 cubic yards)
 SCBAs
 Expendables as needed

2.4 Finance Section

2.4.1 Narrative

ERRS has been funded to \$200,000 The OSC anticipated and requested an additional \$40,000 to complete the project. The additional funds have not yet been issued

These funds are through 2/17/2012 and do not include all site costs yet

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$200,000.00	\$147,600.00	\$52,400.00	26.20%
TAT/START	\$35,000.00	\$11,500.00	\$23,500.00	67.14%
Intramural Costs				
USEPA - Direct	\$39,000.00	\$21,700.00	\$17,300.00	44.36%
USEPA - InDirect	\$27,000.00	\$17,100.00	\$9,900.00	36.67%
Total Site Costs	\$301,000.00	\$197,900.00	\$103,100.00	34.25%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s) Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

OSC Jeff Kimble is the lead for EPA OSC Elizabeth Nightingale is working at the site as well

Bill Poma is the RM and lead H&S person for the ERRS contractor Mr. Poma leads the daily safety briefings at the beginning of each daily shift

2.5.2 Liaison Officer

If needed, OSC will perform these tasks.

2.5.3 Information Officer

If needed, OSC will perform these tasks.

3. Participating Entities

3.1 Unified Command

None. This is a fund lead removal action. There is no Unified Command. The OSC is in charge of this cleanup

3.2 Cooperating Agencies

MDEQ Nancy Johnson is the contact for the State of Michigan MDEQ may oversee the Phase 2 activities conducted by a consultant for Bridgeway Community Church.

4. Personnel On Site

EPA:

- OSC Jeff Kimble
- OSC Elizabeth Nightingale
- Environmental Scientist Keith Lesniak

ERRS

- RM Bill Poma
- Forman Gary Butcher
- 2 Field Techs
- FCA Khris Beck
- 1 Chemist (part time)

START.

- Caitlin Ruza

5. Definition of Terms

- SU = Standard units
- ERRS = Emergency and Rapid Response Services (contract)
- RM = Response manager
- START = Superfund Technical Assessment and Response Team (contract)
- MDEQ = Michigan Department of Environmental Quality
- OSC = On Scene Coordinator
- Hazcat = Process of determining the hazard category of wastes on site, includes field testing of material
- PRP = Potentially responsible party

PPE = Personal protection equipment
RCRA = Resource Conservation and Recovery Act.
LEL = lower explosive limit
O2 = oxygen
H2S = hydrogen sulfide
CO = carbon monoxide
VOC = volatile organic compounds

6. Additional sources of information

NONE

6.2 Reporting Schedule

Weekly or as determined by OSC.

7. Situational Reference Materials

NONE.